

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

CAROLYN RAFAELIAN, an individual, ALEX)
AND ANI PLEDGE CO., a Rhode Island) **Case No.: 1:20-CV-00247-MSM-PAS**
Corporation and VENICE BEACH WALK, LLC,)
a California Limited Liability Company,)
)
)
Plaintiffs,)
)
v.)
)
LC A&A HOLDINGS, INC., a Delaware)
Corporation, LC A&A INTERMEDIATE)
INVESTORS, LLC, a Delaware limited liability)
Company, LYNDON LEA, an individual,)
A and A SHAREHOLDING CO., LLC,)
a Delaware limited liability company and)
ROBERT TRABUCCO, an individual,)
)
Defendants.)
)

PLAINTIFFS' TABLE OF AUTHORITIES IN OPPOSITION TO DEFENDANTS'
MOTION TO DISMISS PLAINTIFFS' AMENDED COMPLAINT

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Dated: October 14, 2020

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 14, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification to all counsel of record and paper copies were sent to those indicated as non-registered participants.

/s/ Kurt T. Kalberer II

Kurt T. Kalberer II